

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

Plaintiff,

ANSWERING AFFIDAVIT

vs.

INDEX NO. 12595/93

REVEREND PAUL P. SABO, INDIVIDUALLY
AND AS PASTOR OF VISITATION ROMAN
CATHOLIC CHURCH, LISTED AS DEFENDANT
BELOW; THE VISITATION ROMAN
CATHOLIC CHURCH SOCIETY OF BUFFALO,
NEW YORK, THE DIOCESE OF BUFFALO,
NEW YORK, MOST REVEREND EDWARD D. HEAD,
D.D., INDIVIDUALLY AS BISHOP OF THE
DIOCESE OF BUFFALO AND AS PRESIDENT
OF THE DIOCESAN CORPORATION and
REVEREND MONSIGNOR ROBERT J.
CUNNINGHAM, INDIVIDUALLY AND AS
CHANCELLOR AND VICAR GENERAL OF THE
DIOCESE OF BUFFALO AND AS SECRETARY
OF THE DIOCESAN CORPORATION,

Defendants.

STATE OF NEW YORK)
COUNTY OF ERIE)ss:
CITY OF BUFFALO)

DENIS A. SCINTA, ESQ., being duly sworn, deposes and says:

1. That I am an attorney at law duly licensed to practice in my profession in the State of New York and a partner in the law firm of SCINTA, RINALDO & DEE, Attorneys for the Defendant, REVEREND PAUL P. SABO.

2. Your deponent has reviewed the Notice of Motion dated August 6, 1996 seeking various relief on behalf of the other Defendants and have further reviewed the Affidavit of TERRENCE M. CONNORS, ESQ., duly sworn to on the 6th day of August,

Scinta, Rinaldo & Dee • Attorneys and Counselors at Law • 205 Elmwood Avenue • Buffalo, New York 14222

Answering Affidavit by Attorney for Defendant
Sabo Sworn to on September 11, 1996

1996, together with a Memorandum of Law submitted in support of such request for relief.

3. Your deponent, by and on behalf of the REVEREND PAUL P. SABO, joins in the relief requested by the other Co-Defendants in this proceeding.

WHEREFORE, your deponent would request that the relief sought in the aforesaid Notice of Motion and supporting Affidavit and Memorandum of Law, be granted in all respects as it relates to the REVEREND PAUL P. SABO, together with such other and further relief as the Court may deem just and proper under all of the circumstances.

/s/ Denis A. Scinta
DENIS A. SCINTA, ESQ.

Sworn to before me this 11th
day of September, 1996.

/s/ Giovanni Genovese

Notary Public, State of New York

Qualified in Erie County

My Commission Expires 5/19/98